

GLENN-COLUSA IRRIGATION DISTRICT'S TESTIMONY
AT THE STATE WATER RESOURCES CONTROL BOARD'S
FOURTH WORKSHOP TO REVIEW STANDARDS
FOR THE SAN FRANCISCO BAY/
SACRAMENTO-SAN JOAQUIN DELTA ESTUARY

This statement is on behalf of Glenn-Colusa Irrigation District (GCID). GCID is the largest diverter of water from the Sacramento River. GCID first acquired water rights in the Sacramento River in 1883. It currently serves 140,000 acres of farmland and 25,000 acres of wildlife refuges with water diverted from the Sacramento River. This is water for 1200 families in both Glenn and Colusa Counties. The estimated crop value produced with this water is approximately \$100 million. The Sacramento River is the life-blood of the people who live and farm within GCID. Accordingly, the District has a vital interest in outcome of this Bay/Delta process and, therefore, offers the following comments to the key issues raised in the State Board's Notice of Public Workshop.

1. What fish and wildlife standards should the SWRCB evaluate as alternatives in this review?

GCID is not here to present to the State Board any specific alternatives for review. The District has, however, made itself aware of the various proposals that are currently under investigation by some of the parties to this proceeding. GCID will continue to evaluate these proposals and will provide the State Board with its specific comments, as appropriate.

In the meantime, GCID urges the State Board to consider standards that are based upon an ecosystem approach. It is critical that the State Board recognize that the Bay-Delta is only one part of a much larger ecosystem.

Specifically, the State Board must avoid actions and recommendations that will adversely affect beneficial uses of water upstream on the Sacramento River. These upstream uses include fish and wildlife, recreational, as well as agricultural, municipal and other consumptive uses. Only through a comprehensive broad-based approach is the State likely to obtain the results it seeks to achieve.

The State Board should avoid establishing standards that are based on recreating some ill-defined historical condition. The system, as a whole, no longer operates as it did historically. The hydrodynamics of the Delta have been modified, the community of the species has changed, and the Delta is home to a much larger urban population. Therefore, it is not realistic to believe that we can recreate the Delta to its former historic self. That is not to say that conditions in the Delta cannot be improved. It simply means that the standards considered by the State Board must be based upon current physical setting, not some hypothetical past condition.

The standards considered by the State Board should also take into account the numerous other factors that affect the health of the estuary other than Delta outflow. In fact, section 13241 (c) of the Water Code, mandates that the State Board consider water quality conditions that can be reasonably achieved through the coordination of all factors affecting water quality. These factors have been well identified through the testimony presented at previous workshops. Although the State Board does not have jurisdiction to regulate all of these factors, it does have the authority to adopt state policy for water quality control which must be complied with by other state agencies and departments that do have the necessary statutory authority to regulate.

Finally, and perhaps most importantly, the standards considered by the State Board must be a reasonable balance between all competing uses of water.

2. How should the economic and social effects of alternative standards be determined?

In evaluating the economic and social impacts of any proposed action or recommendation, the State Board should be aware that, to date, little, if any, analysis has been conducted on the socio-economic impacts of any proposed standard on the Sacramento Valley and its dependent communities. GCID, in conjunction with other Sacramento Valley interests, is currently investigating the nature and extent of the economic analysis that could be conducted to better understand the potential impacts to this area of the implementation of the various alternatives. It is unclear, however, what forum will be made available by the State Board for the interested parties to provide the information that is developed or whether or not the information will be a part of the formal record in these proceedings. If the State Board is considering involving the interested parties in some kind of technical workgroup, GCID would like the opportunity to participate in that process.

In the notice to this workshop the State Board requests recommendations from the participants on methods to be used to analyze the economic and social effects of proposed alternatives. In particular, the State Board requests recommendations on the appropriate method to estimate the extent of water transfers likely to occur and the amount of water likely to be transferred after reductions in Delta water deliveries. Key to the development of this information is, however, an agreement on the base from which the analysis is to begin. GCID firmly believes that the baseline must

begin with a clear recognition of water right priorities and the area of origin protections. If water right priorities and the area of origin protections are not confirmed as part of that baseline, there is little likelihood that any water transfers will occur. Water transfers can only be accomplished if there is certainty. That certainty can only be provided through the preservation of existing water right priorities and area of origin protections.

3. Should the SWRCB request the CVP and SWP to implement portions of the draft standards prior to adoption of a water rights decision?

As a water right holder, GCID is concerned with the possible precedent that could be established by asking the Central Valley Project (CVP) and State Water Project (SWP) to meet water quality standards prior to holding a water rights decision. The law is clear that the State Board cannot implement standards which allocate flow without first complying with the due process protections provided through a water rights proceeding. However, based upon the provision in the framework agreement between the State and Club Fed which provides that an agreement will be sought under which the CVP and SWP will operate to meet proposed standards by 1995, GCID believes that it is proper, in this limited situation, to request that such an agreement be pursued. It is important, however, that the agreement reached between Club Fed and the Department of Water Resources maximize the use of the 800,000 afa dedicated by the CVPIA in order to minimize any additional adverse impacts to CVP contractors.